

Claudia Wilner

From: Claudia Wilner
Sent: Tuesday, February 12, 2019 12:40 PM
To: 'Quinn, Robert E'
Cc: Travis England; Darius Charney
Subject: RE: BLRR v. City of Buffalo - electronic discovery

Rob, I am writing in advance of today's call to identify the subject matter for discussion. We can use the following number for the call: 646-680-8918, 0140943#

First, thank you for providing the City's First Supplemental Response to Plaintiffs' First Set of Interrogatories. We note that the Supplemental Response is unverified, as is the City's initial response. We request that you please provide the verifications required by the federal rules.

Second, we did not receive a response to the issues raised in the email below. We would like to reach agreement on these matters on today's call. We would also like an update on the search process.

Third, we would like to continue our discussion about the City's response to Interrogatory No. 8, which requested information regarding BPD training materials and programs. As we have stated in our prior conversations the City's response identifies in a very general manner the contours of the Erie County Police Training Academy, and provides a similarly general description of Post-Academy training and the persons responsible for its delivery. We would like to discuss narrowing this request to ensure Plaintiffs are able to get the information to which they are entitled while easing any burden on Defendants. While we recognize that you have since provided the name of a retired training officer, we think there is other more specific information you can and should provide in response to this interrogatory.

Fourth, as I stated in another email on January 30, it appears that you have not provided the entirety of the City's Collective Bargaining Agreements. The 2015 MOA states that it is an extension to a CBA that expired on July 1, 2009, and you have never sent us such an agreement. On January 30, you stated that you were going to follow up on this and let us know ASAP, but you never got back to us with an answer.

Fifth, we wanted to follow up on provision of the 311 complaints in native format with the complaint detail field included, as requested in my email of January 28.

Thank you, and speak to you shortly.



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From: Claudia Wilner
Sent: Monday, February 04, 2019 11:08 AM
To: 'Quinn, Robert E' <rquinn@ch.ci.buffalo.ny.us>
Cc: Travis England <england@nklej.org>; Darius Charney <dcharney@ccrjustice.org>
Subject: BLRR v. City of Buffalo - electronic discovery

Rob, I am writing to follow up on several discovery-related matters.

First, please confirm that you will produce the daily Housing, Strike Force, and Traffic reports as part of your first tranche of production in 30 days.

Second, we request that you add the following additional custodians to your search: Jeff Rinaldo, Kevin Helfer, Kimberly Beaty

Third, with regard to the format of production, given your inability to print directly to PDF, we suggest the following procedure. Each custodian should create a folder on his or her computer desktop, then drag the relevant emails from Outlook into that desktop folder. The folder will then be populated with .msg files. Once all emails are in the file, you can copy them to a CD or flash drive and deliver them to the WNYLC. We can do the Bates stamping on our end. Each custodian should do this for their own emails; they should not forward emails to you because that would cause loss of metadata. In the case of retired custodians, your IT department should employ a similar process to search that custodian's account.

Fourth, we request that you add the following additional search terms to your list: Checkpoint, check point, roadblock, roadblocks, road block, road blocks, safety check, safety checks, traffic safety, roadway safety, traffic stop, car stop, vehicle stop, secondary stop, traffic enforcement, traffic violation, traffic violations, traffic fine, traffic fines, traffic summons, traffic ticket, traffic tickets, traffic infraction, traffic infractions, traffic misdemeanor, traffic misdemeanors, traffic arrest, traffic arrests, impound, impounded, impounds, impound lot, tow, towing, towed, tows, plate reader, plate readers, ALPR, tinted window, tinted windows, SF, HU, advisory board, oversight committee, parkside, parkside community association, east side, eastside, traffic study, traffic calming, wheeler, phillips, discriminate, discriminates, discriminated, discrimination, discriminatory, racism, racist, profiled, profiling, bias, biased, disparity, disparities, quota, quotas, operation, community policing, civil rights, diversity, lawsuit, BTVA, TVA, traffic violations agency, attorney general, AG, BMHA, A.D. Price, Camden, Perry, Kenfield, Langfield, Ken/Langfield, Suffolk, Oakmont, Lasalle, Jasper, Ferry/Grider, Ferry-Grider, Grider, Parish, Jasper, Shaffer, Donovan, Frederick Douglas, Carolina Villa, Lakeview, Sedita, Schwab, Marine Drive, Black Love, BLRR, Natasha Soto, Shaketa Redden, Dorethea Franklin, Taniqua Simmons, De'Jon Hall, National Center for Law and Economic Justice, NCLEJ, Western New York Law Center, WNYLC, Center for Constitutional Rights, CCR, Just Resisting, JR, Claudia Wilner, Travis England, Keleman, Keisha Williams, Darius Charney, Vince Warren, Malhotra.

We will likely have additional custodians and search terms to add. We look forward to our next meet and confer on February 12 and will make ourselves available if you want to speak about any of the above before then.

Best,
 Claudia

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